

Similarly, APTS/PBS urge the Commission not to require licensees of public television stations to simulcast their NTSC programming on their DTV station, since that will effectively translate into a requirement that the licensee operate the DTV station whenever the NTSC station is operating. Rather, the Commission should apply the simulcast requirement only during the hours when a licensee operates the DTV station.²¹

Moreover, those public television stations that convert to DTV on their NTSC channels rather than construct a companion DTV station should be given the flexibility to operate during a portion of the day as an NTSC station and a portion of the day as a DTV station. That will permit licensees, for example, to continue offering NTSC programming during the daytime hours or for in-school instructional use, and high definition programming during the evening hours. As such, it will contribute to increasing the penetration of DTV receivers while permitting the licensee to avoid the costs of operating two, entirely independent, full-power stations.

I. Displaced Public Translator Stations Should Have Priority Over Commercial Translators and LPTV Stations In Moving To Replacement Channels

The Commission has established a number of procedures to assist television translator and LPTV licensees displaced as a result of the initiation of DTV, including affording them the ability to apply for a replacement channel on a

²¹ Where a public television licensee operates its DTV station less than the number of hours required to meet the simulcast percentage, the licensee should be required to simulcast for the entire time the DTV station is operating. For example, a public television DTV station would be required to simulcast 100% of its NTSC station if, during the sixth year when 50% of NTSC programming must be simulcast, the DTV station operates no more than 50% of the hours the NTSC station operates. If the DTV station operates 70% of the hours the NTSC station operates, then it would be required to simulcast 50% of the NTSC station's programming.

first-come, first-served basis without being subject to competing applications.²² While these procedures will reduce some of the impact of this proceeding on translators and low power stations, it is highly unlikely that all the currently operating translator and low power stations will be able to continue operating throughout the transition.

This inoperability can significantly affect the ability of public television to reach a substantial portion of the population. As APTS/PBS demonstrated in their Comments in response to the Commission's Sixth Further Notice of Proposed Rulemaking,²³ television translators play a vital role in providing public television services to white areas and rural, sparsely populated areas of the country. Currently, 119 public television stations—about one third of all the public television stations—use 786 translators to bring public television services to areas where there is no other over-the-air service and often no cable service. The loss of significant numbers of these stations will deprive residents of these rural areas of their only public broadcast service, contrary to the long-standing Congressional directive that public television service should be made available to all.

When Congress first provided funding for educational television in 1962, it stated that the funding was provided to assure service to "the greatest number of persons . . ."²⁴ Thirty years later, when Congress enacted the Public Telecommunications Facilities Act of 1992, it added a new subsection to the Section 396 of the Communications Act, declaring it to be "in the public interest for the

²² *Sixth Report* at ¶144.

²³ Comments of the Association of America's Public Television Stations and the Public Broadcasting Service in MM Docket No. 87-268, filed November 22, 1996, at pp. 15-17.

²⁴ Educational Television Facilities Act, Pub. L. No. 87-447, 76 Stat. 64 (1962), *reprinted in* 1962 U.S.C.C.A.N. 79, 81.

Federal Government to ensure that all citizens . . . have access to public telecommunications services . . . ”²⁵ Given the importance Congress has thus placed on making public television service universally available and the increasing role distance learning is playing in enhancing the quality of education in rural areas, the Commission should give public television translator stations priority over other translators or LPTV stations in moving to replacement channels when a public television translator is displaced by a DTV station, a new NTSC station or by an existing NTSC station changing facilities. These stations should be permitted to apply for alternative channels on a protected basis prior to the actual construction or operation of DTV stations which are likely to displace them and where two displaced stations seek new channels at the same time, the public television translator should prevail. Indeed, public television translators should be permitted to file for replacement channels on a protected priority basis now if it is likely that they will be displaced by DTV stations.

²⁵ Public Telecommunications Act of 1992, Pub. L. No. 102-356, 106 Stat. 949 (Aug. 26, 1992) *reprinted in* 1992 U.S.C.C.A.N. 839, 840 (emphasis added). This policy is also reflected in the Cable Television Consumer Protection and Competition Act of 1992, Pub. L. No. 102-385, 106 Stat. 1460 (Oct. 5, 1992), *reprinted in* 1992 U.S.C.C.A.N. 1460, which requires cable carriage of public television programming and the reservation of capacity on direct broadcast satellites for educational use.

III. PETITION FOR CLARIFICATION

The Commission should clarify the following points:

A. Public Television Licensees Are Permitted To Use Excess Capacity On DTV Channels for Revenue Generating Purposes

Section 336 of the Act authorizes television stations awarded DTV authorizations to offer ancillary or supplement services on their DTV channels as long as those services do not cause any derogation of the station's broadcast service.²⁶ The Commission's rules implementing this provision faithfully reflect Congress' intention to give television licensees broad discretion to offer a variety of services over their DTV channels, as long as they offer one free, over-the-air service and the ancillary and supplementary services do not derogate this free DTV service. Specifically, Section 73.624(d) of the rules permits broadcasters to offer computer software distribution, data transmission, teletext, interactive materials, aural messages, paging services, audio signals, subscription video, and any other services. Further, both the statute and the *Fifth Report* make it clear that stations may charge for the use of those ancillary services or otherwise use them for revenue generating purposes.²⁷

Since neither the statute nor the Commission's rule distinguishes between commercial and noncommercial stations, it would appear that both intended to allow public television stations to offer ancillary and supplementary services for revenue generating purposes. To effectuate this intent, the Commission should clarify that Section 73.621 of its rules, the provision requiring noncommercial

²⁶ 47 U.S.C. § 336(a)(2).

²⁷ 47 C.F.R. Sec. 73.624(d); *see also*, *Fifth Report* at ¶¶ 27-36.

educational television licensees to provide a noncommercial service, is not applicable to ancillary and supplemental services. The rule should provide that, as long as public television stations provide one broadcast service pursuant to Section 73.621, stations can use the excess capacity as a source of revenue, subject to the requirements of Section 73.624. Many public broadcasters are counting on the revenue potential of these services to help defray the costs of constructing their DTV facilities and more are looking toward those services as a means of defraying the costs of operating their facilities -- both DTV and NTSC. Public stations are exploring leasing excess digital capacity to commercial operators, joint ventures with commercial entities, and other similar revenue generating opportunities. In light of the uncertainty of continued federal financial support and the tightening of support from the corporate sector, the use of these ancillary and supplemental services for revenue generation is extremely important to the nation's public television system. Indeed, these uses could materially help finance the continuing operation of public television stations over the long term.

Allowing public television licensees to offer these ancillary and supplemental services to generate revenue is consistent with the Commission's existing rules. Those rules permit noncommercial television licensees to utilize the Vertical Blanking Interval, the SAP channel and auxiliary broadcast services for revenue generation.²⁸ Using the excess capacity of DTV transmission for similar purposes follows rationally from these provisions. In both circumstances, public television licensees will be using spectrum not necessary for their primary public television mission as a means of financially supporting their broadcast operations. Accordingly, APTS/PBS urge the Commission to clarify its rules and make it explicit

²⁸ 47 C.F.R. § 73.621(f) & (g), 73.646(b) & (d).

that public television licensees may offer ancillary and supplementary services to generate revenue, including the lease of channel capacity, joint ventures with commercial entities and the other uses permitted under Section 73.624.²⁹

B. Stations May Negotiate Among Themselves For Changes In The Table of DTV Allotments

In many instances stations may be in a position to resolve problems created by the Table of DTV Allotments through negotiated solutions among themselves. While Section 73.623(f) authorizes DTV stations to operate with increased facilities even if interference is caused to an analog station where the analog station agrees, the rest of the rules are silent on whether parties may negotiate channel swaps, relocations of antenna sites, and other changes they believe desirable. As the Broadcasters Caucus notes, there are significant public interest benefits to promoting negotiated arrangements. While the Commission makes a passing reference to such arrangements, it does not take the next step to facilitate such negotiations. APTS/PBS supports the Broadcasters Caucus proposals in this regard and urges the Commission to clarify that it will approve negotiated changes in the Table that do not result in any increased interference to DTV allotments, or NTSC stations or applicants that are not parties to the agreement. The Commission also should clarify that such negotiations can include the payment of money or other consideration from one station to another, including payments to and from public television stations.

²⁹ As APTS/PBS have maintained in previous filings, the Commission should, to the extent feasible, exempt public television licensees from any obligation to pay fees where they offer ancillary services as a source of funding for their public television operation. If the Commission concludes that Section 336(e) of the Act requires that public television stations pay a fee, then the Commission should assess only a nominal fee on revenues used for that purpose.

C. Pending Applicants For Vacant NTSC Channels May Convert To DTV On the NTSC Channel and May Apply For Vacant DTV Channels

In its *Sixth Report*, the Commission has stated that it will “protect those vacant NTSC allotments that are the subject of pending applications and will avoid creating DTV allotments that would conflict with proposed new NTSC allotments.”³⁰ The Commission did not indicate, however, whether applicants authorized to operate NTSC stations on these channels will also be able to convert to DTV on the protected NTSC channel. APTS/PBS urge the Commission to allow those applicants to convert to DTV on those channels at any time during the transition. Since DTV facilities require less separation than analog stations, most of these applicants should be able to convert to DTV on the protected NTSC channels without causing any increased interference. If any cannot, the Commission should make it clear that such applicant will be able to switch to DTV channels after the transition on a protected basis, *i.e.* its application for DTV facilities will not be subject to competing applications. Entities with pending applications for NTSC allotments cannot realistically make the substantial investments required to proceed with their applications and construct facilities absent assurances that their NTSC channels can be converted to DTV.

D. Public Stations Constructing Limited DTV Facilities Should Be Protected Throughout Their Replication Area During the Transition

In its *Reports*,³¹ the Commission allowed broadcasters to construct minimal DTV facilities as long as they provided service to their cities of license. The Commission indicated that it was allowing broadcasters to operate with these

³⁰ *Sixth Report* at ¶112.

³¹ *Fifth Report* at ¶74, n. 161; *Sixth Report* at ¶33.

limited facilities and to “grow into” the power needed for full service area replication over time.³² Unfortunately, the Commission left uncertain whether stations that operate with a lower power level than authorized in the Table of DTV Allotments will remain protected at least until the end of the transition throughout the area it would have served if it had constructed the full authorized facilities.

The lack of assurance that this area will be protected is of particular concern to APTS/PBS since many public television stations are likely to construct and operate with minimal facilities in view of the costs of operating two UHF stations. However, that option will be meaningless if the licensee is not assured protection throughout the area it would have served had it built and operated a fully authorized DTV station. In fact, the rule allowing licensees to construct a limited facility is one of the rules most helpful to public television. In order to make this option meaningful and to avoid forcing these licensees to confront the Hobson’s choice of incurring the costs of increasing power or losing their protected service area, the Commission should provide that licensees of public television stations that elect to build limited DTV facilities will continue to have their coverage areas protected during the transition.

E. Reserved Channels Will Be Reinstated For Noncommercial Use To The Extent Possible

Throughout their Comments in this proceeding, APTS/PBS repeatedly and strenuously argued that the Commission should not delete vacant reserved NTSC channels unless absolutely necessary to provide an existing NTSC station with a DTV channel allotment. Where deletion of a reserved channel was necessary,

³² *Id.*

APTS/PBS urged the Commission to reinstate a reserved DTV channel either at the time it adopted the Table of DTV Allotments or, if that was not possible, at the end of the transition.³³

In the *Sixth Report*, the Commission stated that “the DTV Table replaces existing vacant noncommercial NTSC allotments with new noncommercial reserved DTV allotments where feasible” and that it “will consider establishing additional noncommercial reserved allotments on recovered spectrum for those existing vacant noncommercial allotments that cannot be replaced at this time.”³⁴ It is not clear from these statements, however, whether the Commission will replace all vacant reserved NTSC allotments deleted from the Table that can fit in the Table at the end of the transition or whether some action will be required by the public broadcasting community to re-instate those channels. Given the Commission’s strong and unequivocal stance, reiterated over decades, to retain channels reserved for noncommercial use,³⁵ the Commission should clarify that it will in fact reinstate and reserve for noncommercial use all remaining deleted reserved channels at the end of the transition insofar as possible, consistent with the criteria for new DTV allotments.

³³ Comments of the Association of America’s Public Television Stations and the Public Broadcasting Service in MM Docket No. 87-268, filed November 22, 1996, at pp. 19-26.

³⁴ *Sixth Report* at ¶112.

³⁵ See *Second Report and Order/Further Notice of Proposed Rulemaking*, 7 FCC Rcd 3340, 3350 (1992). See also *Deletion of Noncommercial Reservation of Channel *19, Pittsburgh, Pennsylvania*, 1996 FCC LEXIS 4078 (July 24, 1996).

CONCLUSION

For the foregoing reasons, the Commission should reconsider and clarify the *Reports* in the manner suggested herein.

Respectfully submitted,



Theodore D. Frank
Marcia A. Cranberg
Arnold & Porter
555 12th Street, N.W.
Washington, D.C. 20004
(202) 942-5000

Marilyn Mohrman-Gillis
Vice President, Policy and
Legal Affairs
Lonna M. Thompson
Director, Legal Affairs
Association of America's Public
Television Stations
Suite 200
1350 Connecticut Avenue, N.W.
Washington, D.C. 20036

Gary P. Poon
Executive Director, DTV Strategic Planning
Office
Paula A. Jameson
Senior Vice President,
General Counsel and Secretary
Patricia DiRuggerio
Associate General Counsel
Public Broadcasting Service
1320 Braddock Place
Alexandria, VA 22314

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Appendix A

Public Television DTV Assignments Outside 2-46 Core

DTV Allocation Table -- Public Television Stations Only/ 6th Report and Order. Adopted April 3, 1997 and released April 21, 1997.												
						DIGITAL TELEVISION						
						Service		Existing NTSC				
		NTSC	DTV	DTV	Antenna	During Transistion		Current Service		New Interference		DTV/NTSC
State & City		Channel	Channel	Power	HAAT	AREA	PEOPLE	AREA	PEOPLE	AREA	PEOPLE	Area
				(kw)	(m)	(Sq km)	(thous)	(Sq km)	(thous)	(% NL Area)	(% NL Pop)	Match %
AL	BIRMINGHAM	10	53	1000	404	32562	1543	28403	1428	2.1	2.3	99.9
AL	MOUNT CHEAHA	7	56	1000	610	42883	1996	38085	1739	0.3	0.1	99.6
AR	LITTLE ROCK	2	47	1000	543	45005	994	39049	963	0	0	98.1
CA	HUNTINGTON BEAC	50	48	167.2	330	10136	9299	9534	8947	0.8	0.1	100
CA	SAN JOSE	54	50	50	585	8185	4455	7636	4349	8.1	9.6	98.8
CA	SACRAMENTO	6	53	1000	567	38167	4382	37776	4081	0	0	94.9
CA	LOS ANGELES	28	59	182.2	927	25452	12719	24863	12621	1.1	0.8	99.6
CA	SAN MATEO	60	59	102.7	362	11899	4800	11188	4617	0.5	0.9	99.9
CT	BRIDGEPORT	49	52	50	222	9997	3173	9696	3157	6.6	10.6	97.4
DE	WILMINGTON	12	55	1000	294	23834	7726	20132	6742	0	0	99.7
FL	TAMPA	3	54	1000	473	43415	3702	39567	3244	0	0	99.9
IA	DES MOINES	11	50	1000	600	44693	919	40413	889	0	0	100
ID	COEUR D'ALENE	26	56	50	465	5486	235	4501	184	0	0	100
IL	CHICAGO	11	47	150.2	497	28461	8432	25860	8218	6.8	0.5	99.9
IL	CHARLESTON	51	50	50	70	2801	71	2801	71	0	0	100
IN	MUNCIE	49	52	50	155	9623	537	9550	532	2.3	1.5	100
IN	VINCENNES	22	52	57.8	174	11041	250	11009	249	1.2	1.6	100
IN	EVANSVILLE	9	54	1000	177	22537	718	17469	617	0.6	0.2	100
KY	BOWLING GREEN	53	48	50	247	11922	255	11637	250	2.9	1.6	100
MA	SPRINGFIELD	57	58	50	306	12988	1879	11438	1677	8.3	2.6	100
MD	OAKLAND	36	54	50	216	5810	113	4898	97	1.1	0.4	100
MD	SALISBURY	28	56	81.5	157	13122	339	13190	341	0	0	99.5
MI	FLINT	28	52	115.7	265	14607	2617	14356	2578	0	0	99.6
MI	EAST LANSING	23	55	54.4	296	16624	1384	16287	1333	0.9	0.4	100
MI	MOUNT PLEASANT	14	56	50	158	8653	265	8617	264	3.2	1.7	100
MI	ALPENA	6	57	1000	448	38376	258	29145	180	0	0	99.9
MI	CADILLAC	27	58	50	180	7383	87	7043	84	0	0	100
MS	MERIDIAN	14	47	50	369	18041	314	17020	300	0.9	0.8	100
MS	BOONEVILLE	12	55	480.4	229	15565	295	13444	261	0	0	100
NC	LINVILLE	17	54	124.8	546	18618	910	16911	843	0.9	0.3	99.5
NC	CHAPEL HILL	4	59	1000	469	40706	2859	30299	2262	0	0	99.9
ND	WILLISTON	4	51	1000	278	29451	51	25943	45	0	0	99.5
ND	GRAND FORKS	2	56	1000	408	36001	171	32916	167	0	0	100

Public Television DTV Assignments Outside 2-46 Core

						DIGITAL TELEVISION							
						Service		Existing NTSC					
		NTSC	DTV	DTV	Antenna	During Transistion		Current Service		New Interference		DTV/NTSC	
State & City		Channel	Channel	Power	HAAT	AREA	PEOPLE	AREA	PEOPLE	AREA	PEOPLE	Area	
				(kw)	(m)	(Sq km)	(thous)	(Sq km)	(thous)	(% NL Area)	(% NL Pop)	Match %	
ND	MINOT	6	57	1000	323	34029	100	31675	98	0	0	99.9	
NH	LITTLETON	49	48	50	390	7383	75	6258	62	0.7	0.1	100	
NH	KEENE	52	49	50	329	7453	215	5671	135	0	0	100	
NH	DURHAM	11	57	1000	302	26039	3804	24132	2649	2.6	1.3	98.9	
NJ	MONTCLAIR	50	51	171.6	243	14658	15537	14154	15298	0	0	94.8	
NJ	NEWARK	13	61	190.2	500	23252	17043	23140	17110	1.7	0.6	94.3	
OH	BOWLING GREEN	27	56	50	320	16405	1112	16601	1148	0	0	98.8	
OH	DAYTON	16	58	100.1	350	20406	2881	18568	2681	3.6	2.4	100	
PA	ERIE	54	50	50	268	13401	446	13006	426	0.2	0.1	100	
PA	ALLENTOWN	39	62	50	302	11643	2301	11339	2543	5.5	11.6	97	
PR	SAN JUAN	6	55	977.2	825	54314	-	41882	-	0	-	99.9	
SC	CHARLESTON	7	49	1000	564	33353	825	30920	757	0	0	100	
SC	CONWAY	23	58	81.4	250	16109	450	15408	427	0.5	0.3	100	
TN	LEXINGTON	11	47	1000	195	23613	475	20401	417	0	0	100	
TN	COOKEVILLE	22	52	70.4	425	20176	354	19688	347	1.1	1.3	100	
TX	BELTON	46	47	50	384	15397	603	14824	547	1.6	0.4	100	
TX	HOUSTON	8	53	1000	564	38028	3869	37240	3850	0	0	99.9	
VA	FAIRFAX	56	57	50	215	11873	4371	11068	4071	3.9	2	98.9	
VT	RUTLAND	28	56	50	429	10824	251	10054	243	0	0	100	
WI	PARK FALLS	36	47	50	445	19963	106	19134	97	1.7	1.5	100	
WV	GRANDVIEW	9	53	1000	305	24276	628	22107	545	0	0	97.8	

Public Television DTV Assignments Outside 7-51 Core

DTV Allocation Table -- Public Television Stations Only/ 6th Report and Order. Adopted April 3, 1997 and released April 21, 1997.												
						DIGITAL TELEVISION			Existing NTSC			
						Service						
		NTSC	DTV	DTV	Antenna	During Transistion		Current Service		New Interference		DTV/NTSC
State & City		Channel	Channel	Power	HAAT	AREA	PEOPLE	AREA	PEOPLE	AREA	PEOPLE	Area
				(kw)	(m)	(Sq km)	(thous)	(Sq km)	(thous)	(% NL Area)	(% NL Pop)	Match %
AK	BETHEL	4	3	1	61	9999	8	5629	7	0	0	100
AK	JUNEAU	3	6	1	33	6622	27	2155	27	0	0	100
AL	BIRMINGHAM	10	53	1000	404	32562	1543	28403	1428	2.1	2.3	99.9
AL	MOUNT CHEAHA	7	56	1000	610	42883	1996	38085	1739	0.3	0.1	99.6
CA	SACRAMENTO	6	53	1000	567	38167	4382	37776	4081	0	0	94.9
CA	LOS ANGELES	28	59	182.2	927	25452	12719	24863	12621	1.1	0.8	99.6
CA	SAN MATEO	60	59	102.7	362	11899	4800	11188	4617	0.5	0.9	99.9
CT	BRIDGEPORT	49	52	50	222	9997	3173	9696	3157	6.6	10.6	97.4
DE	WILMINGTON	12	55	1000	294	23834	7726	20132	6742	0	0	99.7
FL	TAMPA	3	54	1000	473	43415	3702	39567	3244	0	0	99.9
ID	COEUR D'ALENE	26	56	50	465	5486	235	4501	184	0	0	100
IN	MUNCIE	49	52	50	155	9623	537	9550	532	2.3	1.5	100
IN	VINCENNES	22	52	57.8	174	11041	250	11009	249	1.2	1.6	100
IN	EVANSVILLE	9	54	1000	177	22537	718	17469	617	0.6	0.2	100
MA	SPRINGFIELD	57	58	50	306	12988	1879	11438	1677	8.3	2.6	100
MD	OAKLAND	36	54	50	216	5810	113	4898	97	1.1	0.4	100
MD	SALISBURY	28	56	81.5	157	13122	339	13190	341	0	0	99.5
M	KALAMAZOO	52	5	1	125	4044	342	4028	341	6	2.5	100
M	FLINT	28	52	115.7	265	14607	2617	14356	2578	0	0	99.6
M	EAST LANSING	23	55	54.4	296	16624	1384	16287	1333	0.9	0.4	100
M	MOUNT PLEASANT	14	56	50	158	8653	265	8617	264	3.2	1.7	100
M	ALPENA	6	57	1000	448	38376	258	29145	180	0	0	99.9
M	CADILLAC	27	58	50	180	7383	87	7043	84	0	0	100
MS	BOONEVILLE	12	55	480.4	229	15565	295	13444	261	0	0	100
NC	LINVILLE	17	54	124.8	546	18618	910	16911	843	0.9	0.3	99.5
NC	CHAPEL HILL	4	59	1000	469	40706	2859	30299	2262	0	0	99.9
ND	GRAND FORKS	2	56	1000	408	36001	171	32916	167	0	0	100
ND	MINOT	6	57	1000	323	34029	100	31675	98	0	0	99.9
NH	DURHAM	11	57	1000	302	26039	3804	24132	2649	2.6	1.3	98.9
NJ	NEWARK	13	61	190.2	500	23252	17043	23140	17110	1.7	0.6	94.3
OH	BOWLING GREEN	27	56	50	320	16405	1112	16601	1148	0	0	98.8
OH	DAYTON	16	58	100.1	350	20406	2881	18568	2681	3.6	2.4	100
OR	LA GRANDE	13	5	1	787	21361	76	14518	39	0	0	100

Public Television DTV Assignments Outside 7-51 Core

						DIGITAL TELEVISION						
						Service		Existing NTSC				
		NTSC	DTV	DTV	Antenna	During Transistion		Current Service		New Interference		DTV/NTSC
State & City		Channel	Channel	Power	HAAT	AREA	PEOPLE	AREA	PEOPLE	AREA	PEOPLE	Area
				(kw)	(m)	(Sq km)	(thous)	(Sq km)	(thous)	(% NL Area)	(% NL Pop)	Match %
PA	ALLENTOWN	39	62	50	302	11643	2301	11339	2543	5.5	11.6	97
PR	SAN JUAN	6	55	977.2	825	54314	-	41882	-	0	-	99.9
SC	CONWAY	23	58	81.4	250	16109	450	15408	427	0.5	0.3	100
TN	COOKEVILLE	22	52	70.4	425	20176	354	19688	347	1.1	1.3	100
TX	HOUSTON	8	53	1000	564	38028	3869	37240	3850	0	0	99.9
VA	ROANOKE	15	3	1	634	26331	944	20746	828	1.2	1	99.3
VA	FAIRFAX	56	57	50	215	11873	4371	11068	4071	3.9	2	98.9
VT	RUTLAND	28	56	50	429	10824	251	10054	243	0	0	100
WV	GRANDVIEW	9	53	1000	305	24276	628	22107	545	0	0	97.8

Appendix B

Public Television State Networks Only-DTV Table of Allotments and Assignments

DTV Allocation Table -- Public Television Stations Only/ 6th Report and Order. Adopted April 3, 1997 and released April 21, 1997.												
						DIGITAL TELEVISION		Existing NTSC				
		NTSC	DTV	DTV	Antenna	Service						
						During Transistion		Current Service		New Interference		DTV/NTSC
State & City		Channel	Channel	Power	HAAT	AREA	PEOPLE	AREA	PEOPLE	AREA	PEOPLE	Area
				(kw)	(m)	(Sq km)	(thous)	(Sq km)	(thous)	(% NL Area)	(% NL Pop)	Match %
AL	BIRMINGHAM	10	53	1000	404	32562	1543	28403	1428	2.1	2.3	99.9
AL	DEMOPOLIS	41	19	50	333	15153	121	15040	121	0.4	0.4	100
AL	FLORENCE	36	22	50	221	12336	261	12098	259	8.1	3.6	100
AL	HUNTSVILLE	25	24	50	352	18363	725	17357	706	0.3	0.1	100
AL	LOUISVILLE	43	42	155.7	275	14437	267	14481	267	1	0.5	99.4
AL	MOBILE	42	18	50	183	11337	528	11453	533	0.5	0.1	98.3
AL	MONTGOMERY	26	14	50	183	12913	376	12595	372	4.5	3	99.9
AL	MOUNT CHEAHA	7	56	1000	610	42883	1996	38085	1739	0.3	0.1	99.6
AR	ARKADELPHIA	9	46	897	326	28446	372	24331	322	0	0	99.8
AR	FAYETTEVILLE	13	45	966.9	506	36427	710	31152	624	0	0	99.9
AR	JONESBORO	19	20	50	311	17558	246	17453	245	0	0	100
AR	LITTLE ROCK	2	47	1000	543	45005	994	39049	963	0	0	98.1
AR	MOUNTAIN VIEW	6	35	1000	424	38092	514	31061	357	0	0	99.3
CT	BRIDGEPORT	49	52	50	222	9997	3173	9696	3157	6.6	10.6	97.4
CT	HARTFORD	24	32	50	262	13189	2859	11674	2651	11.5	11.2	98.9
CT	NEW HAVEN	65	39	50	82	1425	546	1369	530	0	0	100
CT	NORWICH	53	45	50	207	10135	1016	9558	838	3.2	4.6	98.6
GA	ATHENS	8	22	574.5	326	29168	3378	25830	3264	0	0	100
GA	CHATSWORTH	18	33	317.3	564	20031	1538	17109	1056	1.3	2.2	99.7
GA	COCHRAN	29	7	4.6	350	21221	552	19855	520	0	0	99.9
GA	COLUMBUS	28	23	183.8	461	23027	870	22061	833	4.3	4.2	100
GA	DAWSON	25	26	50	329	14790	306	14699	304	0.9	2.1	99.9
GA	PELHAM	14	20	261.6	378	22976	647	22614	638	0.1	0	99.9
GA	SAVANNAH	9	46	917.3	320	29353	642	25471	597	0	0	100
GA	WAYCROSS	8	18	509.2	314	29201	386	25190	342	0	0	100
GA	WRENS	20	36	312	452	24753	616	24593	614	4.8	3.3	98.3
HI	HONOLULU	11	18	120.2	33	7255	799	7519	836	0	0	95.4
HI	WAILUKU	10	30	50.1	1811	51943	139	40768	121	0	0	100
IA	COUNCIL BLUFFS	32	33	50	98	6348	642	5791	631	1.2	0.4	100
IA	DES MOINES	11	50	1000	600	44693	919	40413	889	0	0	100
IA	FORT DODGE	21	25	50	355	20644	211	20632	211	0.2	0.1	100
IA	IOWA CITY	12	45	882.8	439	35423	1080	30996	929	0	0	100
IA	MASON CITY	24	18	50	436	19851	279	19674	275	0.6	0.2	100

Public Television State Networks Only-DTV Table of Allotments and Assignments

						DIGITAL TELEVISION							
						Service		Existing NTSC					
		NTSC	DTV	DTV	Antenna	During Transistion		Current Service		New Interference		DTV/NTSC	
State & City		Channel	Channel	Power	HAAT	AREA	PEOPLE	AREA	PEOPLE	AREA	PEOPLE	Area	
				(kw)	(m)	(Sq km)	(thous)	(Sq km)	(thous)	(% NL Area)	(% NL Pop)	Match %	
IA	RED OAK	36	35	60.4	475	20200	745	19928	745	1.3	2.6	100	
IA	SIOUX CITY	27	28	154.8	326	19601	263	19331	262	0.3	0.6	100	
IA	WATERLOO	32	35	227.4	579	29126	740	28446	698	1.8	2.2	100	
ID	BOISE	4	21	693.1	754	44517	394	48288	395	0.6	0.1	92.1	
ID	COEUR D'ALENE	26	56	50	465	5486	235	4501	184	0	0	100	
ID	MOSCOW	12	33	739.7	346	26753	131	25838	151	0	0	99.2	
ID	POCATELLO	10	17	181.5	465	29737	229	28205	228	0	0	99.7	
ID	TWIN FALLS	13	24	50	161	11305	101	11221	101	0	0	100	
KY	ASHLAND	25	26	50	152	7417	389	6801	371	4.7	9.5	99.9	
KY	BOWLING GREEN	53	48	50	247	11922	255	11637	250	2.9	1.6	100	
KY	COVINGTON	54	24	50	122	5890	1572	5419	1533	3.9	1.6	100	
KY	ELIZABETHTOWN	23	43	50	198	12141	742	10995	409	0.5	0.2	100	
KY	HAZARD	35	16	50	384	15138	348	13480	296	4.5	3.6	100	
KY	LEXINGTON	46	42	50	265	13711	639	13491	635	6.3	3.2	99.1	
KY	LOUISVILLE	15	17	50	262	13888	1187	13303	1177	1.6	0.4	100	
KY	LOUISVILLE	68	38	50	249	13222	1169	12722	1158	0	0	99.6	
KY	MADISONVILLE	35	42	50	317	14285	293	13997	291	2.6	2	100	
KY	MOREHEAD	38	15	50	293	13757	221	12686	200	0.5	0.8	100	
KY	MURRAY	21	36	50	201	12314	288	12298	288	8.9	3.9	100	
KY	OWENSBORO	31	29	50	140	9668	454	9789	459	1.7	0.7	97	
KY	OWENTON	52	44	50	216	11130	424	10787	409	0.1	0	100	
KY	PADUCAH	29	41	50	152	7265	177	7069	174	5.2	3.7	100	
KY	PIKEVILLE	22	24	50	430	17095	454	15956	430	0.4	0.2	100	
KY	SOMERSET	29	14	50	445	18607	402	17371	371	1.3	1.9	100	
LA	ALEXANDRIA	25	26	64.6	415	19599	318	19527	317	0	0	100	
LA	BATON ROUGE	27	22	71.2	303	16048	809	15122	761	0.2	0	100	
LA	LAFAYETTE	24	23	61.5	369	18304	536	18304	536	0	0	100	
LA	LAKE CHARLES	18	20	50	314	18006	374	18010	374	0.4	0.1	100	
LA	MONROE	13	19	530.4	543	41003	691	36053	621	0	0	100	
LA	SHREVEPORT	24	23	50	326	19134	563	18901	560	0	0	100	
MD	ANNAPOLIS	22	42	334.5	265	20084	6096	19485	5762	11.2	3.6	96.3	
MD	BALTIMORE	67	29	50	250	11576	4097	10599	3156	14.2	6.4	98.4	
MD	FREDERICK	62	28	50	138	8037	2439	6929	1690	0.1	0.1	99.4	
MD	HAGERSTOWN	31	44	200.3	378	16002	883	13813	713	1.3	1.5	99.5	

Public Television State Networks Only-DTV Table of Allotments and Assignments

						DIGITAL TELEVISION						
						Service		Existing NTSC				
		NTSC	DTV	DTV	Antenna	During Transistion		Current Service		New Interference		DTV/NTSC
State & City		Channel	Channel	Power	HAAT	AREA	PEOPLE	AREA	PEOPLE	AREA	PEOPLE	Area
				(kw)	(m)	(Sq km)	(thous)	(Sq km)	(thous)	(% NL Area)	(% NL Pop)	Match %
MD	OAKLAND	36	54	50	216	5810	113	4898	97	1.1	0.4	100
MD	SALISBURY	28	56	81.5	157	13122	339	13190	341	0	0	99.5
ME	AUGUSTA	10	17	602	305	26995	792	24295	739	0	0	100
ME	BIDDEFORD	26	45	50	244	12054	671	11449	645	0	0	99.2
ME	CALAIS	13	15	178	134	15204	32	12154	28	0	0	100
ME	ORONO	12	22	948.3	302	27681	336	24328	320	0	0	99.8
ME	PRESQUE ISLE	10	20	520.7	332	29048	80	26107	77	0	0	100
MS	BILOXI	19	35	74.2	478	21446	675	21018	648	1.1	0.8	100
MS	BOONEVILLE	12	55	480.4	229	15565	295	13444	261	0	0	100
MS	BUDE	17	18	50	341	16657	226	14775	207	2.9	3.6	100
MS	GREENWOOD	23	26	50	317	15296	249	15236	249	0	0	100
MS	JACKSON	29	20	50	598	25082	639	24663	631	3.1	1.5	100
MS	MERIDIAN	14	47	50	369	18041	314	17020	300	0.9	0.8	100
MS	MISSISSIPPI STA	2	38	1000	381	37521	553	29904	422	0	0	100
MS	OXFORD	18	36	50	423	18258	346	18417	348	0.5	0.3	99.1
MT	BOZEMAN	9	20	50	33	2277	46	2200	46	0	0	100
MT	MISSOULA (new)	11	27	50	631	9985	86	8984	85	0	0	100
NC	ASHEVILLE	33	25	96.7	816	23135	1446	20494	1338	0.8	0.7	99.7
NC	CHAPEL HILL	4	59	1000	469	40706	2859	30299	2262	0	0	99.9
NC	COLUMBIA	2	20	1000	302	33693	660	27798	245	0	0	100
NC	CONCORD	58	44	142.5	422	25173	2126	24274	2084	4.6	2.4	99.9
NC	GREENVILLE	25	23	50	351	15427	645	14305	598	2.3	1.7	100
NC	JACKSONVILLE	19	44	203.2	561	25214	728	25182	727	0.2	0	100
NC	LINVILLE	17	54	124.8	546	18618	910	16911	843	0.9	0.3	99.5
NC	LUMBERTON (new)	31	25	92.1	319	20338	847	20623	853	7.7	9	98.1
NC	ROANOKE RAPIDS	36	39	50	368	19461	548	18410	517	1.3	0.6	100
NC	WILMINGTON	39	29	144.8	553	26659	635	26311	627	0	0	100
NC	WINSTON-SALEM	26	43	311.7	504	24841	1714	23447	1642	0.3	0.1	99.8
ND	BISMARCK	3	22	868	425	37485	124	29273	111	0	0	100
ND	DICKINSON	9	20	708	246	23705	43	21684	37	0	0	100
ND	ELLENDALE	19	20	50	179	8894	12	8866	12	5	1.5	100
ND	FARGO	13	39	571.2	344	29370	239	27002	226	0	0	100
ND	GRAND FORKS	2	56	1000	408	36001	171	32916	167	0	0	100
ND	MINOT	6	57	1000	323	34029	100	31675	98	0	0	99.9

Public Television State Networks Only-DTV Table of Allotments and Assignments

						DIGITAL TELEVISION						
						Service		Existing NTSC				
		NTSC	DTV	DTV	Antenna	During Transistion		Current Service		New Interference		DTV/NTSC
State & City		Channel	Channel	Power	HAAT	AREA	PEOPLE	AREA	PEOPLE	AREA	PEOPLE	Area
				(kw)	(m)	(Sq km)	(thous)	(Sq km)	(thous)	(% NL Area)	(% NL Pop)	Match %
ND	WILLISTON	4	51	1000	278	29451	51	25943	45	0	0	99.5
NE	ALLIANCE	13	24	593.2	469	36126	92	31465	83	0	0	100
NE	BASSETT	7	15	473.5	453	36511	52	32997	38	0	0	100
NE	HASTINGS	29	14	50	372	20167	166	20155	166	2.9	1.7	100
NE	LEXINGTON	3	26	1000	323	34565	169	25614	118	0	0	100
NE	MERRIMAN	12	17	564.4	328	28624	30	24104	23	0.1	0	100
NE	NORFOLK	19	16	50	348	16129	204	14712	199	4.1	2.5	100
NE	NORTH PLATTE	9	16	543.6	311	28750	66	25659	61	0	0	100
NE	OMAHA	26	17	50	130	9268	698	9120	696	4.8	0.6	100
NJ	CAMDEN	23	22	68.6	271	17269	5873	17865	6092	3.4	4	96.6
NJ	MONTCLAIR	50	51	171.6	243	14658	15537	14154	15298	0	0	94.8
NJ	NEW BRUNSWICK	58	18	50	223	12005	12745	9001	10886	2.1	8.7	100
NJ	TRENTON	52	43	50	271	14602	8450	13051	7454	2.1	1.1	99.3
OK	CHEYENNE	12	8	15.1	299	27427	97	23103	77	0	0	100
OK	EUFAULA	3	31	1000	399	34860	654	25056	348	0	0	98.9
OK	OKLAHOMA CITY	13	32	700	465	37649	1299	32294	1233	0	0	100
OK	OKLAHOMA CITY	43	40	53.2	475	23719	1133	23352	1128	1.4	0.6	100
OK	TULSA	11	38	802.4	521	40129	1150	35069	1080	0	0	100
OR	BEND	3	11	19.2	227	19374	104	22098	104	0	0	87.7
OR	CORVALLIS	7	39	1000	375	24882	967	23686	848	0	0	97.8
OR	EUGENE	28	29	50	276	8622	343	7830	333	1.2	0.2	100
OR	LA GRANDE	13	5	1	787	21361	76	14518	39	0	0	100
OR	PORTLAND	10	27	646.6	530	30034	1971	28520	1882	0	0	99.9
RI	PROVIDENCE	36	21	50	182	11210	2577	11133	2569	8.4	3.3	97
SC	ALLENDALE	14	33	50	244	13624	362	13573	358	1.9	2	99.8
SC	BEAUFORT	16	44	50	390	19727	670	19643	670	0.3	0.4	100
SC	CHARLESTON	7	49	1000	564	33353	825	30920	757	0	0	100
SC	COLUMBIA	35	32	50	314	14267	727	14039	721	5.5	2.3	100
SC	CONWAY	23	58	81.4	250	16109	450	15408	427	0.5	0.3	100
SC	FLORENCE	33	45	50	241	12388	382	12120	379	1	0.6	100
SC	GREENVILLE	29	9	4.9	392	19055	1186	19301	1190	0.5	0.3	93.9
SC	GREENWOOD	38	18	50	235	14231	774	14390	764	0.5	0.4	98.1
SC	ROCK HILL	30	15	50	210	11318	1017	11334	1006	6.8	6.7	95.7
SC	SPARTANBURG	49	43	50	296	15730	1043	15059	977	2.8	2	99.8

Public Television State Networks Only-DTV Table of Allotments and Assignments

						DIGITAL TELEVISION						
						Service		Existing NTSC				
		NTSC	DTV	DTV	Antenna	During Transistion		Current Service		New Interference		DTV/NTSC
State & City		Channel	Channel	Power	HAAT	AREA	PEOPLE	AREA	PEOPLE	AREA	PEOPLE	Area
				(kw)	(m)	(Sq km)	(thous)	(Sq km)	(thous)	(% NL Area)	(% NL Pop)	Match %
SC	SUMTER	27	28	50	354	17105	715	16471	529	1	0.7	100
SD	ABERDEEN	16	17	50	357	20483	75	20039	71	0	0	100
SD	BROOKINGS	8	18	767.3	229	24013	139	20117	127	0.4	1.6	100
SD	EAGLE BUTTE	13	24	618.5	518	39782	20	34774	17	0	0	100
SD	LOWRY	11	15	352.8	317	27805	29	21711	24	0	0	100
SD	MARTIN	8	20	895.5	265	26063	29	23541	27	0	0	100
SD	PIERRE	10	21	561	488	37574	60	32004	55	0	0	99.9
SD	RAPID CITY	9	23	68.3	202	13894	102	13117	106	0	0	99.2
SD	SIOUX FALLS	23	24	50	54	1623	122	1623	122	0.2	0	100
SD	VERMILLION	2	34	1000	232	29029	437	28686	434	0	0	98.9
VT	BURLINGTON	33	32	50	815	25027	449	23456	428	0.5	0.2	100
VT	RUTLAND	28	56	50	429	10824	251	10054	243	0	0	100
VT	ST. JOHNSBURY	20	18	50	592	17391	180	13973	146	0.7	0.4	100
VT	WINDSOR	41	24	50	684	19498	486	16023	370	2	3	99.9
WA	CENTRALIA	15	19	50	347	13745	418	11570	297	0.7	1.2	100
WA	TACOMA	28	26	50	232	11699	2424	11033	2456	1.3	5.7	99.1
WI	GREEN BAY	38	42	50	360	17527	733	17366	728	0	0	100
WI	LA CROSSE	31	30	50	347	17661	311	16864	297	2.7	1.8	100
WI	MADISON	21	20	50	453	22106	899	21760	888	2.3	1.4	99
WI	MENOMONIE	28	27	50	346	17842	387	16347	319	0.2	0	100
WI	PARK FALLS	36	47	50	445	19963	106	19134	97	1.7	1.5	100
WI	WAUSAU	20	24	50	300	17856	354	17796	354	1.5	0.7	100
WV	GRANDVIEW	9	53	1000	305	24276	628	22107	545	0	0	97.8
WV	HUNTINGTON	33	34	60.4	379	16913	746	16430	723	1.4	0.5	99.9
WV	MORGANTOWN	24	33	139.2	457	20753	1336	19799	1254	2.7	7.7	99.6
WY	LANDER	4	8	57.4	463	36727	34	37280	33	0	0	97.4
VI	CHARLOTTE AMALI	12	44	50.1	451	22957	-	15899	-	0	-	100

Appendix C

Public Television: Both NTSC Channel and DTV Assignment Outside 2-46 Core

DTV Allocation Table -- Public Television Stations Only/ 6th Report and Order. Adopted April 3, 1997 and released April 21, 1997.												
						DIGITAL TELEVISION						
						Service		Existing NTSC				
		NTSC	DTV	DTV	Antenna	During Transistion		Current Service		New Interference		DTV/NTSC
State & City		Channel	Channel	Power	HAAT	AREA	PEOPLE	AREA	PEOPLE	AREA	PEOPLE	Area
				(kw)	(m)	(Sq km)	(thous)	(Sq km)	(thous)	(% NL Area)	(% NL Pop)	Match %
CT	BRIDGEPORT	49	52	50	222	9997	3173	9696	3157	6.6	10.6	97.4
IN	MUNCIE	49	52	50	155	9623	537	9550	532	2.3	1.5	100
NH	LITTLETON	49	48	50	390	7383	75	6258	62	0.7	0.1	100
CA	HUNTINGTON BEAC	50	48	167.2	330	10136	9299	9534	8947	0.8	0.1	100
NJ	MONTCLAIR	50	51	171.6	243	14658	15537	14154	15298	0	0	94.8
IL	CHARLESTON	51	50	50	70	2801	71	2801	71	0	0	100
NH	KEENE	52	49	50	329	7453	215	5671	135	0	0	100
KY	BOWLING GREEN	53	48	50	247	11922	255	11637	250	2.9	1.6	100
CA	SAN JOSE	54	50	50	585	8185	4455	7636	4349	8.1	9.6	98.8
PA	ERIE	54	50	50	268	13401	446	13006	426	0.2	0.1	100
VA	FAIRFAX	56	57	50	215	11873	4371	11068	4071	3.9	2	98.9
MA	SPRINGFIELD	57	58	50	306	12988	1879	11438	1677	8.3	2.6	100
CA	SAN MATEO	60	59	102.7	362	11899	4800	11188	4617	0.5	0.9	99.9

Public Television: Both NTSC Channels and DTV Assignments Outside 7-51 Core

DTV Allocation Table -- Public Television Stations Only/ 6th Report and Order. Adopted April 3, 1997 and released April 21, 1997.												
						DIGITAL TELEVISION			Existing NTSC			
		NTSC	DTV	DTV	Antenna	Service		Existing NTSC				
						During Transistion						Current Service
State & City		Channel	Channel	Power	HAAT	AREA	PEOPLE	AREA	PEOPLE	AREA	PEOPLE	Area
				(kw)	(m)	(Sq km)	(thous)	(Sq km)	(thous)	(% NL Area)	(% NL Pop)	Match %
ND	GRAND FORKS	2	56	1000	408	36001	171	32916	167	0	0	100
AK	JUNEAU	3	6	1	33	6622	27	2155	27	0	0	100
FL	TAMPA	3	54	1000	473	43415	3702	39567	3244	0	0	99.9
AK	BETHEL	4	3	1	61	9999	8	5629	7	0	0	100
NC	CHAPEL HILL	4	59	1000	469	40706	2859	30299	2262	0	0	99.9
CA	SACRAMENTO	6	53	1000	567	38167	4382	37776	4081	0	0	94.9
MI	ALPENA	6	57	1000	448	38376	258	29145	180	0	0	99.9
ND	MINOT	6	57	1000	323	34029	100	31675	98	0	0	99.9
PR	SAN JUAN	6	55	977.2	825	54314	-	41882	-	0	-	99.9
MI	KALAMAZOO	52	5	1	125	4044	342	4028	341	6	2.5	100
VA	FAIRFAX	56	57	50	215	11873	4371	11068	4071	3.9	2	98.9
MA	SPRINGFIELD	57	58	50	306	12988	1879	11438	1677	8.3	2.6	100
CA	SAN MATEO	60	59	102.7	362	11899	4800	11188	4617	0.5	0.9	99.9